

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

PHYLLIS HORACE,

Plaintiff,

vs.

LASALLE BANK NATIONAL  
ASSOCIATION, AS TRUSTEE FOR  
CERTIFICATE HOLDERS OF BEAR  
STEARNS ASSET BACKED SECURITIES  
I LLC, ASSET BACKED CERTIFICATES,  
SERIES 2006-EC2; BEAR STEARNS  
ASSET BACKED SECURITIES I LLC,  
ASSET BACKED CERTIFICATES, SERIES  
2006-EC2; MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.; ENCORE  
CREDIT CORPORATION; EMC MORTGAGE  
COMPANY; BANK OF AMERICA, et al.,

Defendants.

CASE NUMBER:  
3-08-cv-01019

**UNOPPOSED MOTION TO EXTEND TIME FOR FILING 26(F) REPORT**

COME NOW all the Defendants who have filed an Answer in this matter<sup>1</sup> and file this unopposed motion to extend time set by this Court for the parties to file their Rule 26(f) report. In support thereof, the undersigned states as follows:

1. The current action was removed to this Court on or about December 29, 2008. This Court subsequently entered an order stating that the parties were to file their Rule 26(f) report by January 23, 2009.

2. Upon contacting Plaintiff's counsel to discuss the Rule 26(f) report, the undersigned was notified by Plaintiff's counsel that he believed that the report should be stayed

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<sup>1</sup> This includes all named entities with the exception of Encore Credit Corporation.

because Plaintiff's counsel planned to file a motion to remand. The undersigned stated that if in fact a motion to remand was filed, then he would not oppose a motion to continue the time for filing the Rule 26(f) report.

3. To date, to the undersigned's knowledge, no motion to remand has been filed nor have the parties conducted their Rule 26(f) meeting.

Accordingly, the undersigned respectfully requests that this Court temporarily extend the time for the submission of the Rule 26(f) report.

Respectfully submitted this 23<sup>rd</sup> day of January, 2009.

/s/ SHAUN RAMEY

Shaun Ramey  
Meaghan E. Ryan  
Attorneys for Defendants

Lasalle Bank National Association, as Trustee for  
Certificates Holders of Bear Stearns Asset Backed  
Securities I LLC, Asset Backed Certificates, Series  
2006-EC2; Bear Stearns Asset Backed Securities I  
LLC, Asset Backed Certificates, Series 2006-EC2;  
Mortgage Electronic Registration Systems, Inc.;  
EMC Mortgage Company; and Bank of America,  
National Association

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of January 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Nick Wooten, Esq.  
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/s/ SHAUN RAMEY  
OF COUNSEL